Exhibit 1
Docket No. CWA-309(a)-09-002

Apra Harbor WWTP
NPDES No. GU0110119
Select Effluent Limitations and Monitoring Requirements, Outfall 001

Parameter	Units	Effluent Limitations		Monitoring Requirements	
		Average Monthly	Maximum Daily	Monitoring Frequency	Sample Type
Aluminum	ug/L	120	200	Monthly	24 hr Composite
	lb/day	4.37	7.17		
Copper	ug/L	2.9	4.8	Monthly	24 hr Composite
	lb/day	0.105	0.172		
Nickel	ug/L	8.2	13	Monthly	24 hr Composite
	lb/day	0.294	0.483		
Enterococci	CFU/ 100mL	35	57	Weekly	Discrete
Total Chlorine Residual	ug/L	7.5	12.3	Weekly	Discrete
	lb/day	0.269	0.442		
Biochemical Oxygen Demand (5-day)	Both the influent and the effluent shall be monitored. The arithmetic mean of the BOD values, by concentration, for effluent samples collected over a calendar month shall not exceed 15 percent of the arithmetic mean, by concentration, for influent samples collected at approximately the same times during the same period (85% removal).				
Total Suspended Solids	Both the influent and the effluent shall be monitored. The arithmetic mean of the BOD values, by concentration, for effluent samples collected over a calendar month shall not exceed 15 percent of the arithmetic mean, by concentration, for influent samples collected at approximately the same times during the same period (85% removal).				

Exhibit 2
Docket No. CWA-309(a)-09-002

Apra Harbor WWTP
NPDES No. GU0110119
Select Effluent Limitations and Monitoring Requirements, Outfall 002

Parameter	Units	Effluent Limitations	Monitoring Requirements	
		Maximum Daily	Monitoring Frequency	Sample Type
Aluminum	ug/l	200	Monthly	Composite
Copper	ug/l	3	Monthly	Composite
Manganese	ug/l	20	Monthly	Composite
Zinc	ug/l	10	Monthly	Composite
Turbidity	NTU	0.5	Upon each discharge	Discrete

Exhibit 3
Docket No. CWA-309(a)-09-002

Apra Harbor WWTP
NPDES No. GU0110019
Outfall 001 Effluent Limit Violations
April 2005 - June 2008

Aluminum (Al)				
Month	**Monthly Ave. (Load) Limit = 4.37 lb/day**	**Daily Max. (Load) Limit = 7.17 lb/day**	**Monthly Ave. (Concentration) Limit = 120 ug/l**	**Daily Max. (Concentration) Limit = 200 ug/l**
Apr 2005	16.15	16.15	896	896
May 2005	35.22	35.22	1580	1580
Jun 2005	27.89	27.89	1220	1220
Jul 2005	17.91	17.91	732	732
Aug 2005	5.65	5.65	210	210
Sep 2005	13.86	13.86	487	487
Oct 2005	43.43	43.43	1790	1790
Nov 2005	22.8	22.8	1518	1518
Dec 2005	22.82	22.82	1595	1595
Jan 2006	6.9	-	486	486
Feb 2006	8.8	8.8	710	710
Mar 2006	10.63	10.63	877	877
Apr 2006	18.12	18.12	1160	1160
May 2006	-	-	207	207
Jun 2006	4.74	-	243	243
Jul 2006	11.69	11.69	501	501
Aug 2006	10.42	10.42	431	431
Sep 2006	9.71	9.71	461	461
Oct 2006	7.61	7.61	325	325
Nov 2006	13.54	13.54	709	709

Exhibit 3
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Apra Harbor WWTP
NPDES No. GU0110019
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Dec 2006	14.13	14.13	745	745
Jan 2007	12.98	12.98	730	730
Feb 2007	-	-	200	200
Mar 2007	22.85	22.85	1290	1290
Apr 2007	6.59	-	364	364
May 2007	4.46	-	228	228
Jun 2007	-	-	183	-
Jul 2007	-	-	125	-
Aug 2007	-	-	158	-
Sep 2007	-	-	166	-
Oct 2007	-	-	122	-
Nov 2007	-	-	240	240
Dec 2007	-	-	145	-
Jan 2008	6.16	-	367	367
Feb 2008	4.51	-	260	260
Mar 2008	8.26	21.32	461	1190
Apr 2008	4.47	5.81	306	-
May 2008	-	-	199	554
Jun 2008	-	-	158	-

Exhibit 3
Docket No. CWA-309(a)-09-002

Apra Harbor WWTP
NPDES No. GU0110019
Outfall 001 Effluent Limit Violations
April 2005 - June 2008

Copper (Cu)				
Month	**Monthly Ave. (Load) Limit = 0.105 lb/day**	**Daily Max. (Load) Limit = 0.172 lb/day**	**Monthly Ave. (Concentration) Limit = 2.9 ug/l**	**Daily Max. (Concentration) Limit = 4.8 ug/l**
Apr 2005	-	-	4.53	-
May 2005	.171	-	7.68	7.68
Jun 2005	.191	.191	8.36	8.36
Jul 2005	.219	.219	8.97	8.97
Aug 2005	-	-	2.98	-
Oct 2005	.184	.184	7.59	7.59
Nov 2005	.112	-	7.43	7.43
Mar 2006	-	-	7.07	7.07
Apr 2006	.289	.289	18.5	18.5
May 2006	-	-	3.24	-
Jun 2006	-	-	4.04	-
Jul 2006	.19	.19	8.14	8.14
Aug 2006	.476	.476	19.7	19.7
Sep 2006	.161	-	7.65	7.65
Nov 2006	.111	-	5.82	5.82
Dec 2006	-	-	5.27	5.27
Feb 2007	-	-	4.29	-
Mar 2007	.113	-	6.35	6.35
May 2007	.134	-	6.84	6.84
Jun 2007	.201	.201	9.67	9.67

Exhibit 3
Docket No. CWA-309(a)-09-002

Apra Harbor WWTP
NPDES No. GU0110019
Outfall 001 Effluent Limit Violations
April 2005 - June 2008

Copper (Cu)				
Month	**Monthly Ave. (Load) Limit = 0.105 lb/day**	**Daily Max. (Load) Limit = 0.172 lb/day**	**Monthly Ave. (Concentration) Limit = 2.9 ug/l**	**Daily Max. (Concentration) Limit = 4.8 ug/l**
Jul 2007	.13	-	6.24	6.24
Aug 2007	.122	-	6.5	6.5
Sep 2007	.162	-	8.56	8.56
Oct 2007	.13	-	7.46	7.46
Nov 2007	.181	.181	10.5	10.5
Dec 2007	.172	-	9.53	9.53
Jan 2008	.133	-	7.92	7.92
Feb 2008	.185	.185	10.7	10.7
Mar 2008	.133	-	7.42	7.42
Apr 2008	-	-	4.28	5.81
May 2008	.165	-	12.2	12.2
Jun 2008	-	-	4.38	-

Exhibit 3
Docket No. CWA-309(a)-09-002

Apra Harbor WWTP
NPDES No. GU0110019
Outfall 001 Effluent Limit Violations
April 2005 - June 2008

Nickel (Ni)				
Month	**Monthly Ave. (Load) Limit = 0.294 lb/day**	**Daily Max. (Load) Limit = 0.483 lb/day**	**Monthly Ave. (Concentration) Limit = 8.2 ug/l**	**Daily Max. (Concentration) Limit = 13.0 ug/l**
May 2005	-	-	10.74	-
Jun 2005	-	-	9.65	-
Jul 2005	-	-	9.21	-
Aug 2005	.317	-	11.8	-
Oct 2005	.415	-	17.1	17.1
Dec 2005	-	-	8.67	-
Feb 2006	-	-	20.7	20.7
Mar 2006	-	-	8.67	-
Apr 2006	-	-	9.53	-
May 2006	-	-	10.7	-
Jun 2006	-	-	10.2	-
Jul 2006	-	-	10.4	-
Oct 2006	-	-	11	-
Dec 2006	-	-	9.24	-
Jan 2007	-	-	11.4	-
Feb 2007	-	-	13.1	13.1
Mar 2007	-	-	16.6	16.6
Apr 2007	-	-	-	-
May 2007	-	-	-	-

Exhibit 3
Docket No. CWA-309(a)-09-002

Apra Harbor WWTP
NPDES No. GU0110019
Outfall 001 Effluent Limit Violations
April 2005 - June 2008

Nickel (Ni)				
Month	**Monthly Ave. (Load) Limit = 0.294 lb/day**	**Daily Max. (Load) Limit = 0.483 lb/day**	**Monthly Ave. (Concentration) Limit = 8.2 ug/l**	**Daily Max. (Concentration) Limit = 13.0 ug/l**
Jun 2007	.417	-	20.1	20.1
Jul 2007	.303	-	14.5	14.5
Aug 2007	-	-	13.7	13.7
Sep 2007	-	-	13.9	13.9
Oct 2007	-	-	12	-
Nov 2007	-	-	10.6	-
Dec 2007	.309	-	17.1	17.1
Jan 2008	-	-	10.3	-
Feb 2008	-	-	14.8	14.8
Mar 2008	-	-	12.69	18
Apr 2008	-	-	10.77	-
May 2008	-	-	12.0	-
Jun 2008	-	-	13.1	13.1

Exhibit 3
Docket No. CWA-309(a)-09-002

Apra Harbor WWTP
NPDES No. GU0110019
Outfall 001 Effluent Limit Violations
April 2005 - June 2008

Enterococci		
Month	**Monthly Ave. (Concentration) Limit = 35 CFU/100 ml**	**Daily Max. (Concentration) Limit = 57 CFU/100 ml**
May 2005	-	178
May 2006	-	77
Apr 2007	-	140
May 2007	77.1	155
Jun 2007	87.3	948
Jul 2007	-	93.2
Feb 2008	-	95.9
May 2008	-	69.8

Total Residual Chlorine			
Month	**Daily Max. (Load) Limit = 0.442 lb/day**	**Monthly Ave. (Concentration) Limit = 7.5 ug/l**	**Daily Max. (Concentration) Limit = 12.3 ug/l**
Jul 2007	1.178	11.6	54
Feb 2008	.458	-	22.5
Jun 2008	4.405	10.31	440

Exhibit 3
Docket No. CWA-309(a)-09-002

Apra Harbor WWTP
NPDES No. GU0110019
Outfall 001 Effluent Limit Violations
April 2005 - June 2008

BOD % Removal	
Month	**Limit >= 85% removal**
Mar 2006	72.2
Apr 2006	75.9
May 2006	53.1
Jun 2006	8.7
Jul 2006	66.9
Aug 2006	79.4
Mar 2007	79.8
May 2007	83.9
Jun 2007	71.2
Sep 2007	69.2
Dec 2007	76.9
Apr 2008	82.4
May 2008	81.4
Jun 2008	64.6

Exhibit 3
Docket No. CWA-309(a)-09-002

Apra Harbor WWTP
NPDES No. GU0110019
Outfall 001 Effluent Limit Violations
April 2005 - June 2008

TSS % Removal	
Month	**Limit >= 85% removal**
Apr 2005	75.2
Jun 2005	79.3
Jul 2005	79.8
Mar 2006	82.2
Apr 2006	82
May 2006	73.9
Jun 2006	50.9
Jul 2006	49.4
Apr 2007	70.3
Jun 2007	71.1

Exhibit 4
Docket No. CWA-309(a)-09-002

Apra Harbor WWTP
NPDES No. GU0110019
Outfall 002 Effluent Limit Violations
April 2005 - June 2008

Month	Turbidity Limit = 0.5 NTU	Aluminum Limit = 200 ug/l	Copper Limit = 3 ug/l	Manganese Limit = 20 ug/l	Zinc Limit = 10 ug/l
Dec 2006	1800	1990000	277	39200	213
Jun 2008	1300	2130000	216	4690	312

U.S. ENVIRONMENTAL PROTECTION AGENCY - REGION IX

WATER MANAGEMENT DIVISION

MSGP STORMWATER COMPLIANCE INSPECTION REPORT

Facility:	U.S. Navy Naval Base Guam
NPDES Permit No.:	GUR05A008
USEPA Representative:	Jeremy Johnstone Senior Environmental Engineer
USN Representatives:	Omar Damian, Environmental Engineering Intern, NAVFAC Marianas EVBL Romeo Ascunsion, DZSP 21 Domingo Cabasao, DZSP 21
Guam EPA Representatives:	Oscar Delfin, Engineer II Maricar Quezon, Engineer II
Date of Inspection:	16 July 2008
Report Prepared by:	Jeremy Johnstone

INTRODUCTION

On July 16-17, 2008 Jeremy Johnstone of the U.S. EPA Region 9 conducted NPDES compliance inspections at the U.S. Navy's Naval Base Guam (USN NBG) as part of a multi-media inspection of this facility. The purpose of the NPDES inspections was to determine the Navy's compliance status with respect to the following three permits and areas:

- EPA's National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges From Construction Activities No. GUR100000 (aka the Construction General Permit, or CGP);

- EPA's NPDES General Permit for Stormwater Discharges From Industrial Activities No. GUR05*### (aka the Multi-Sector General Permit, or MSGP); and the

- Apra Harbor Wastewater Treatment Plant (AHWWTP), NPDES Permit No. GU0110019

The inspection consisted of examination of the facility records and walk-throughs of various Base facilities, plus there was some continued post-inspection information exchange between USN and EPA. **This is the report for the MSGP portion of the inspection.**

Other EPA programs represented in the multi-media inspection included: Resource Conservation and Recovery Act (RCRA); Spill Prevention, Control, and Countermeasure (SPCC); and underground storage tank systems (UST). Reports for each of these inspections have been separately prepared.

FACILITY DESCRIPTION

Naval Base Guam consists of numerous naval commands and facilities at a consolidated Navy installation with several component complexs across the island of Guam. These component areas include: Orote Point/Apra Harbor (the Main Base); Polaris Point (Submarine Operations facility); Naval Ordnance Annex (formerly Naval Magazine Guam); North Finegayan Site (formerly NCTS Guam) South Finegayan; Barrigada (formerly NCTS Barrigada); and the Tenjo Valley and Sasa Valley Fuel Facilities.

The Main Base is broken out into the following operational areas and annexes

- Waterfront Area (Apra Harbor and Pier Areas, Site III, Camp Covington)
- Ordnance Annex
- Public Works Center (PWC) Annex

- Communications Annex (Finegayan/Barrigada)
- Navy Fuel Farm (Tenjo Vista and Sasa Valley)

The field component of this MSGP Stormwater Compliance inspection was limited to portions of the PWC Annex which, according to the Storm Water Pollution Prevention Plan (SWPPP) that was developed for Base and PWC Annex, consists of:

AHWWTP (Bldgs 1794-1820)
Orote Power Plant (Bldg. 307)
Boiler Plant (Bldg 27)
Transportation Maintenance Shop (Bldg 372)
Material Handling Equipment (MHE) Shop (Bldg 364)
Filling Station (Bldg 374)
Machine Shop (Bldg 1768)
Sanitary Landfill
Less-Than-90-Day Hazardous Waste Storage Facility
Hazardous Waste Conforming Storage Facility (Bldg 1790)
Bioremediation Facility

NPDES PERMIT REQUIREMENTS AND STORMWATER MANAGEMENT AT NBG

Storm water at NBG flows through a system of drain inlets, curbs, gutters, swales, and outfalls to Apra Harbor. NBG could ordinarily be considered to own and operate a non-traditional municipal separate storm sewer system (MS4) subject to NPDES permitting under EPA's Phase II stormwater regulations. However, there is reportedly an agreement between the Government of Guam and the U.S. Bureau of the Census whereby there are no federally recognized urbanized areas on Guam. Therefore no MS4s on Guam - NBG or other - are currently subject to NPDES permitting requirements.

EPA's Multi-Sector General Permit (MSGP) for Industrial Activities (on Guam this is NPDES No. GUR05*###) requires that certain specific types of storm water discharges associated with industrial activity submit an application for coverage under, and comply with the terms of, the permit. The types of subject industrial activities are sector-based, and include several of the types of operational areas that occur at Navy bases in general and at NBG in particular.

The MSGP became effective on 30 Oct 2000 and expired 30 Oct 2005. As of the date of this inspection the MSGP had not yet been re-issued, although it was subsequently re-issued by EPA on 22 September 2008, with an effective date of 29 September 2008 and an expiration date of 29 September 2013. However, the terms and conditions of the expired permit continued to apply to then-current enrollees, like USN NBG, during the interim period between expiration and re-issuance.

USN NBG originally applied for NPDES industrial stormwater permit coverage under the predecessor permit to the MSGP, the "Baseline General Permit". Upon issuance of the MSGP, USN NBG subsequently (on 2 March 2001) applied for coverage under that permit and received Tracking No. GUR05A008 from the EPA.

The USN's Notice of Intent (NOI) seeking coverage under the MSGP for NBG listed the following industrial activities as those it was seeking discharge authorization for:

> "Landfills, Land Application Sites, and Open Dumps; Ship and Boat Building or Repairing Yards; Water Transportation; SIC Primary Code: Marine cargo handling; SIC Secondary Code: Ship and Boat Building or Repairing Yards"

It is worth noting that the NOI filing process limits applicants to indicating three sectors of industrial activity.

Pursuant to MSGP requirements, the Navy has developed a Storm Water Pollution Prevention Plan (SWPPP) for NBG. For this inspection an updated SWPPP with a date of December 2005 was provided for review. The SWPPP was comprised of one main volume, 5 annex-specific volumes, visual monitoring report log sheets, and a volume comprised of reports of Annual Comprehensive Site Compliance Evaluations (ACSCEs).

The 2005 SWPPP update provides a more comprehensive listing of industrial activities that occur on-base:

Sector K -	Hazardous Waste treatment, Disposal or Storage
Sector L -	Landfills and Land Application Sites (subsector LF)
Sector N -	Scrap Recycling Facilities (SIC 5093, Scrap Recycling Facilities)
Sector O -	Steam Electric Generating Facilities (subsector SE)
Sector P -	Land Transportation and Warehousing (SIC 4419, 5171)
Sector Q -	Water Transportation (SIC 4491, 4493)
Sector T -	Treatment Works (subsector TW)
Sector AB -	Transportation Equipment, Industrial or Commercial Machinery (SIC 3599)

USN utilizes a contractor consortium, DZSP 21, to provide base operating support contract (BOSC) services for facilities operation and maintenance at NBG, including implementation of the stormwater management program.

FINDINGS

1. On the day of inspection it was partly cloudy and hot with isolated showers.

2. USN and DZSP 21 contract staff appeared to be knowledgeable about MSGP requirements, SWPPP contents and NBG stormwater management practices.

3. Based upon a spot check review, the Navy's 2005 SWPPP and monitoring and inspection records appeared to be largely comprehensive, complete and up to date, with the following notable exceptions:
   a. it was not certified by a responsible official;
   b. the NFM Annex (Vol. IV) does not include BMPs for all Site III activities, e.g. submarine maintenance, not for other vessel maintenance activities that may occur on-base (note - vessel drydock activities are performed by another entity, Guam Shipyard, that is located at NBG) ;
   c. field verification indicated that some text and maps are outdated, e.g.:
      i. the 2005 SWPPP refers to a <90 day hazardous waste storage area, but this facility has since been demolished;
      ii. Maintenance Shop (Bldg. 1793), reportedly a 2 year old structure, is not included in the current (2005) SWPPP.

4. The Navy conducts Annual Comprehensive Site Compliance Evaluations (ACSCEs), generally in August. The results of the ACSCEs are documented and used in updating the SWPPP. However, the process of updating the SWPPP can take more than a year from when the ACSCEs are conducted. Prior to the inspection, the last ASCSE was conducted in August 2007, but the resulting revisions to the SWPPP were still in development. This lag leads to a lack timely correction of identified problems and can lead to out of date controls and site diagrams continuing in use, or not being included in the SWPPP, as discussed above.

5. Drive-bys and walkthroughs of select areas of industrial activities indicated that most were clean and well maintained. At the Transportation Maintenance Shop (Bldg 364) a crew was cleaning up wet paint that had been newly applied but washed off of the roof as a result of a rain shower. (Photo IMG_0006).

6. However, also at the Transportation Maintenance Shop, several vehicles and pieces of equipment were parked over oil stains, some apparently fresh. As there had been a recent rain shower, there was also a noticeable sheen in the area, but there was no evidence of drip pans in use anywhere at this shop. This issue was also noted in the Aug. 2007 ASCE report for this shop, thus it appears to be a chronic issue. (Photos IMG_0008, IMG_0009, IMG_0010).

PHOTO LOG

IMG_0006 Crew cleaning up fresh paint that had washed off of roof in a rain event.

IMG_0008 The water in this photo had a visible sheen on it, also asphalt by the fork lifts showed staining from past or current drips and leaks. There were no

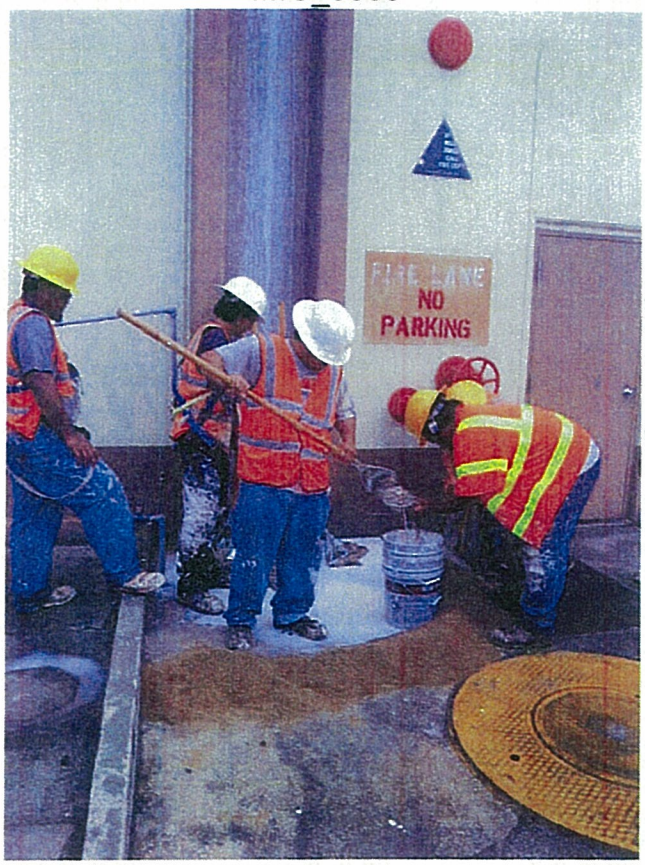
drip pans or other BMPs in evidence.

IMG_0009 Staining of asphalt, evidence of a drip or leak, under this parked truck, with no drip pan or other BMPs in evidence.

IMG_0010 Drip stain under another parked truck, with no drip pan or other BMPs in evidence.

USN Naval Base Guam, MSGP Inspection of Main Base Area, 7/16/08

IMG_0006



IMG_0008

All photos by Jeremy Johnstone, EPA Region 9

USN Naval Base Guam, MSGP Inspection of Main Base Area, 7/16/08

IMG_0009

IMG_0010

All photos by Jeremy Johnstone, EPA Region 9

EXHIBIT 6

U.S. ENVIRONMENTAL PROTECTION AGENCY - REGION IX

WATER MANAGEMENT DIVISION

CGP STORMWATER COMPLIANCE INSPECTION REPORT

Facility:	U.S. Navy Naval Base Guam
NPDES Permit Nos.:	GUR100000 GUR10A082 GUR10A149 GUR10A090
USEPA Representative:	Jeremy Johnstone Senior Environmental Engineer
USN Representatives:	Omar Damien, Environmental Engineering Intern, NAVFAC Marianas EVBL
Guam EPA Representatives:	Oscar Delfin, Engineer II Maricar Quezon, Engineer II
Date of Inspection:	16-17 July 2008
Report Prepared by:	Jeremy Johnstone

INTRODUCTION

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CONSTRUCTION ACTIVITIES AND NPDES PERMIT REQUIREMENTS

On the days of the inspection there were several projects under construction at USN NBG, plus several more in the planning/approval process. This CGP Stormwater Compliance Inspection was limited to the following three projects under construction on the Main Base portion of NBG:

- McCool Elementary and Middle School
- North Tipalao Housing Revitalization
- Old Apra Heights Housing Revitalization

EPA's CGP (on Guam this is NPDES Permit No. GUR100000) requires that operators of construction activity with discharges of storm water apply for coverage under the permit. Further, the permit recognizes two types of operators: those having operational control over either the construction plans and specifications, including the ability to make modifications to those plans and specifications (e.g., owner or developer of project), or having day-to-day operational control of those activities at a project which are necessary to ensure compliance with a storm water pollution prevention plan (SWPPP) for the site or other permit conditions (e.g., general contractor).

EPA's CGP, which was effective 7/1/03 and was set to expire on 7/1/08. The CGP was re-issued by EPA on 6/30/08, effective that date and with an expiration date of 7/1/10.

FINDINGS

General

1. On the days of the inspection the weather was mostly sunny to mostly cloudy and hot with isolated showers.

2. At the time of the inspection the Navy had several construction projects on-going at Naval Base Guam, with others funded and anticipated to commence within the next several months.

3. The Navy's contractors had submitted Notices of Intent (NOIs) seeking coverage under the CGP for some of its then-ongoing projects. The Navy itself would appear to meet one of the definitions of "operator" under the permit (having operational control over either the construction plans and specifications, including the ability to make modifications to those plans and specifications...") and thus also be required to separately file for coverage for these projects, but as of the time of the inspections it had not.

4. Based upon discussions with US Navy representatives, it did not appear that Navy construction inspectors were evaluating the adequacy of stormwater management practices at these construction projects.

5. In the planning of any future base improvements the Navy should be aware of and comply with Section 438, Energy Independence and Security Act of 2007, which requires, in summary, that federal facility development projects with a footprint exceeding 5,000 square feet to use site planning, design, construction,

and maintenance strategies to control storm water runoff.

McCool Elementary / Middle School Project (inspected 16 July 2008)

6. This project, consisting of the construction of a new elementary and middle school reportedly commenced in January 2007, and was mostly complete at the time of the inspection, with some final landscaping activities on-going.

7. The project's general contractor, Dick Pacific Construction, had submitted an NOI seeking coverage under the CGP on 15 June 2006. EPA assigned tracking No. GUR10A082 to the project. The NOI indicated Apra Harbor as the nearest named receiving water. The NOI indicated the total disturbed Soil Area (DSA) as being approximately 31 acres.

8. A SWPPP for the project had been developed, with a preparation date of 15 October 2005. A spot check of the SWPPP indicated that it did not meet the minimum requirements of the CGP in that it did not include a site map showing drainage flow paths, discharge points or BMP locations, nor was a copy of the CGP included as required. The SWPPP indicated the DSA at 16 acres and the receiving waters as Sumay Bay.

9. The job site had posted signage indicating CGP coverage nor was a copy of the CGP retained con-site. Both of these items are requirements under the CGP.

10. The area near to the contractor's trailer office was still being worked, had unstabilized soils and inadequately maintained drain inlet protection BMPs showing evidence of off-site sediment discharges (Photos IMG_0014, IMG_0016, IMG_0017, IMG_0020).

North Tipalao Housing Revitalization Project (inspected 16 July 2008)

11. This approximately 27 acre project to revitalize a typhoon-damaged housing complex reportedly commenced in January 2007. At the time of the inspection Phase 1 (96 housing units) was reported to be approximately 92% complete, with the application of topsoil and seeding activities continuing to occur. Phase 2 (108 housing units) was reported to be approximately 15-20% complete.

12. As of the date of the inspection the project did not have CGP coverage. The project's general contractor, Watts Construction, submitted an NOI seeking coverage under the CGP on 17 July 2008, the day after the inspection. EPA assigned tracking No. GUR10A149 to the project and granted permit coverage effective 24 July 2008. Any discharges prior to that date would not have been authorized under the NPDES program.

13. The NOI that was submitted on 17 July 2008 indicated Agat Bay as the nearest named receiving water, and also indicated that a SWPPP for the project had been prepared prior to filing. However, no SWPPP was available on-site at the time of the inspection.

14. At the contractor's yard, there was evidence of fluid spillage and staining of the ground, with no clean-up having yet been performed. (Photos IMG_0022, IMG_0023)

15. There were few or no soil stabilization BMPs employed within the project, resulting in sediment transport onto roadways and into drainage systems. (Photo IMG_0034)

16. Drain inlets (DIs) and perimeter sediment controls were inadequately implemented and maintained. (Photos IMG_0026, IMG_0035, IMG_0036)

Old Apra Housing Revitalization Project (drive-by inspection on 17 July 2008)

17. This project to revitalize a typhoon-damaged housing complex was viewed only from the public street at the lower end of the project perimeter.

18. The project's general contractor, Black Construction, submitted an NOI seeking coverage under the CGP on 18 October 2007. EPA assigned tracking No. GUR10A090 to the project and granted permit coverage effective 25 October 2007. The NOI indicated a DSA of 62 acres and the Aplacho River was listed as the nearest named receiving water.

19. Viewed from the bottom of the project are, no internal controls were in evidence and installed sediment controls were inadequate in that sediment accumulations were observed immediately adjacent to a DI. There was also evidence of an apparent concrete slurry discharge off site and to this same DI. (Photos IMG_0022, IMG_0023)

PHOTO LOG

USN Naval Base Guam, CGP Inspection of McCool Schools Project, 7/16/08

IMG_0014 Ponding basin on east side of school near subcontractors' offices. Note turbidity in standing water and failed silt fence used as inlet protection.

IMG_0016 Failed silt fence used as drain inlet protection, project's southwest perimeter.

IMG_0017 Unstabilized soils and silt fence used as inlet protection.

IMG_0020 Unstabilized soils upgradient of the drain inlet shown in IMG_0014.

USN Naval Base Guam, CGP Inspection of North Tipalao Housing Project, 7/16/08

IMG_0022 Stained soil and empty bottle next to a diesel tank

IMG_0023 Stains running down the side of a fuel tank, no BMPs to keep the filler hose from leaking onto the ground.

IMG_0026 Ponded water where runoff leaves the project area at bottom of road by athletic fields. Note gap in gravel bag berm, turbid water, lack of BMPs by stockpiles to left.

IMG_0034 Landscaping activities at Phase 1 area. Note unstabilized soils, lack of any BMPs, and heavy sediment accumulations in roadway.

IMG_0035 Silt fence used as drain inlet protection. Note gap beneath, unstabilized soils upgradient, and sediment accumulations in roadway.

IMG_0036 Silt fence used as drain inlet protection. Note gap beneath and sediment accumulations in roadway.

USN Naval Base Guam, CGP Inspection of Old Apra Heights Housing Project, 7/17/08

IMG_0022 View along gutter tributary to a drain inlet. Note sediment accumulations and dried concrete slurry.

IMG_0023 Another view of the drain inlet depicted immediately above, note lack of soil stabilization BMPs.

USN Naval Base Guam, CGP Inspection of McCool School Project, 7/16/08

IMG_0014

IMG_0016

All photos by Jeremy Johnstone, EPA Region 9

USN Naval Base Guam, CGP Inspection of McCool School Project, 7/16/08

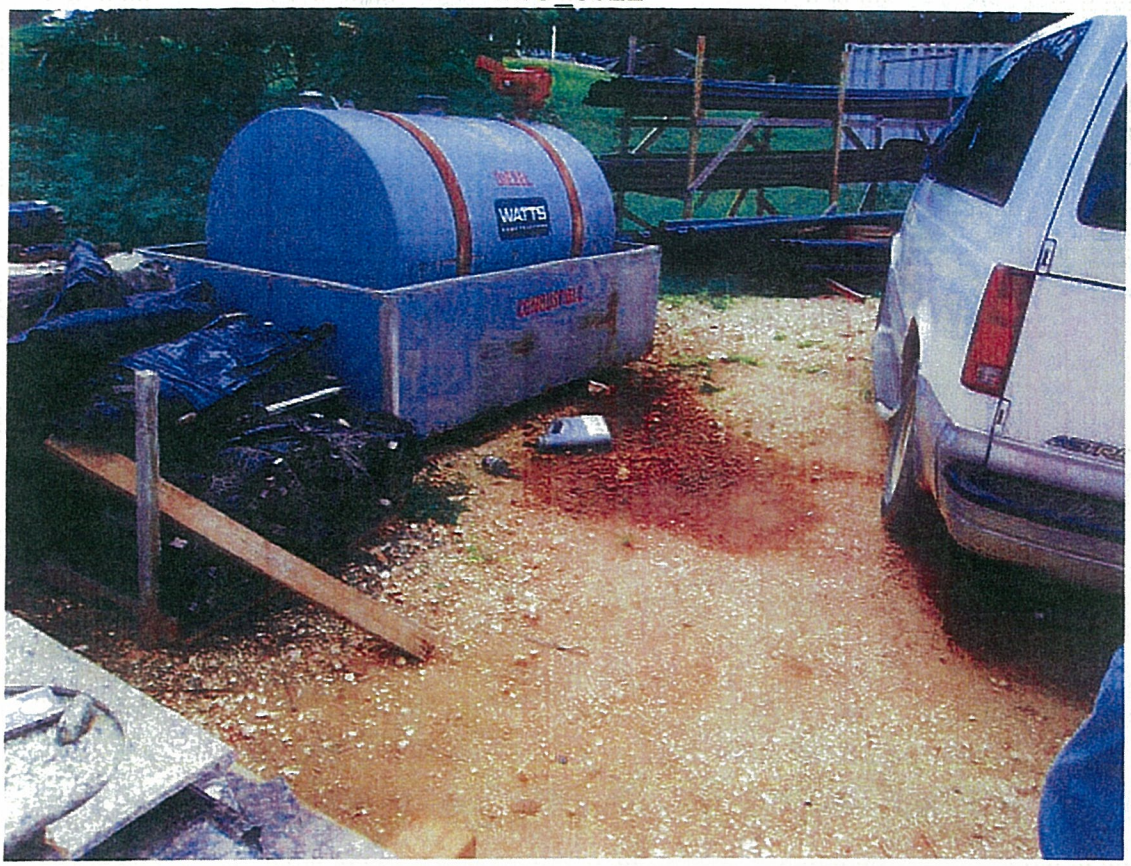
IMG_0017

IMG_0020

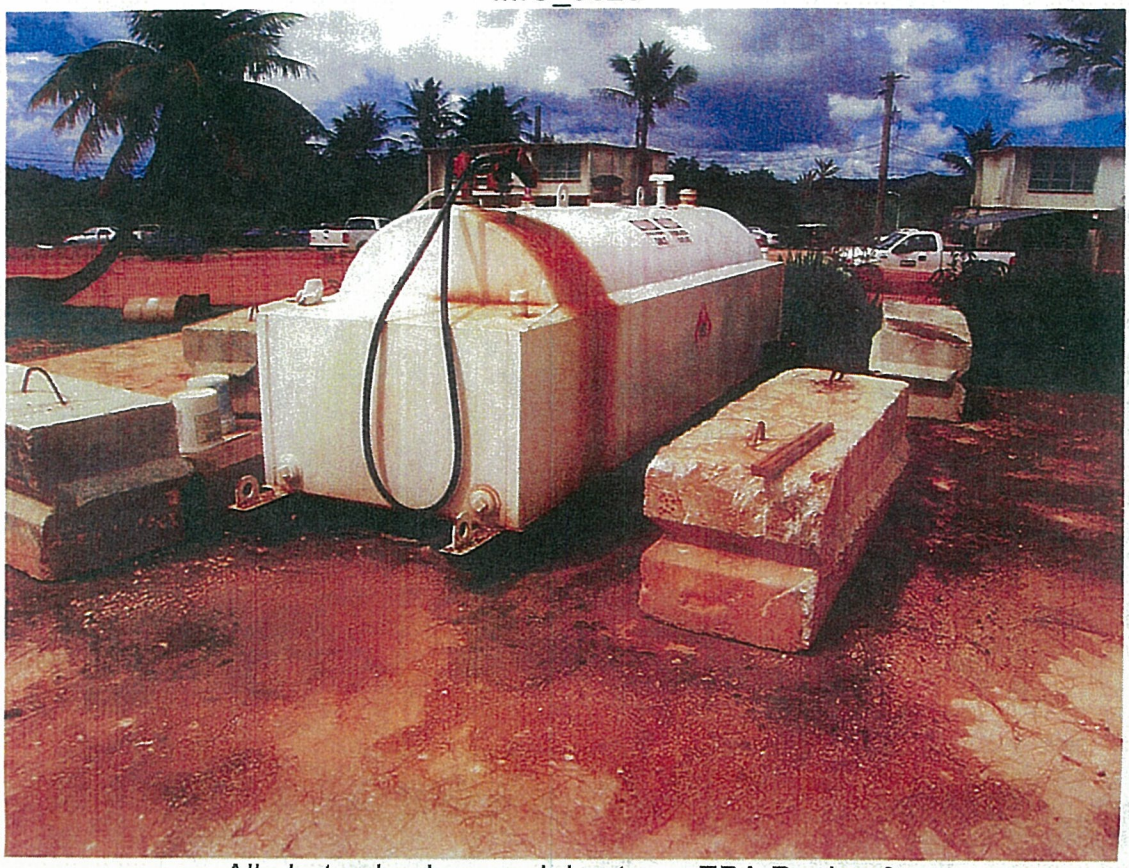
All photos by Jeremy Johnstone, EPA Region 9

USN Naval Base Guam, CGP Inspection of North Tipalao Housing Project, 7/16/08

IMG_0022



IMG_0023



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USN Naval Base Guam, CGP Inspection of North Tipalao Housing Project, 7/16/08

IMG_0026

IMG_0034

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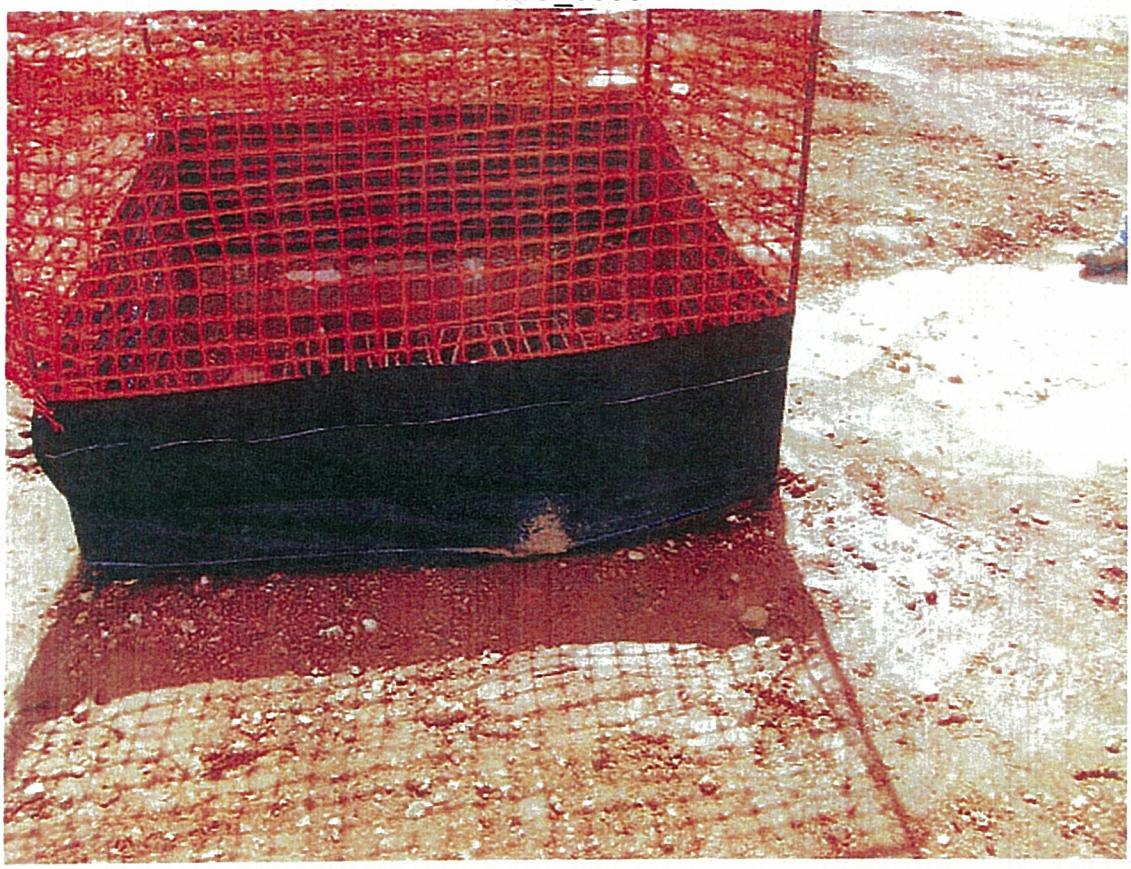
USN Naval Base Guam, CGP Inspection of North Tipalao Housing Project, 7/16/08

IMG_0035



IMG_0036

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USN Naval Base Guam, CGP Inspection of Apra Hieghts Housing Project, 7/17/08

IMG_0022

IMG_0023

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